

In the Matter of

Request for FCC Wireless Bureau Amateur Radio Rule Change

Requested by:

Michael R. Reynolds MBA, CPA  
FCC Amateur License W0KIE  
3826 South 92<sup>nd</sup> East Place  
Tulsa, OK 74145

I submit this amateur radio rule change request to the Secretary of the FCC on March 2, 1999.

Summary:

Amateur radio rule 97.1 Basis and purpose for "recognition and enhancement of the value of the **amateur service to the public** as a voluntary noncommercial communications service, particularly with respect to providing emergency communications."

I submit that the amateur service to the public, including emergency communications can be greatly enhanced if amateur licensees were permitted to make one way transmissions intended for reception by the general public, either direct or relayed, where permitted by international radio regulations, above 420 MHz.

Changes requested:

97.111 Authorized transmissions:

(6) Transmissions necessary to disseminate information bulletins.  
Transmissions above 420 MHz to disseminate noncommercial communications to the community, particularly with respect to providing emergency information.

97.111 Prohibited transmissions:

(4) Music using a phone emission below 420 MHz except as specifically provided elsewhere in this section;  
(5b) An amateur station shall not engage in any form of broadcasting below 420 MHz nor may an amateur station transmit one-way communications

below 420 MHz except as specifically provided in these rules; nor shall an amateur station engage in any activity related to program production or new gathering for broadcasting purposes below 420 MHz,.....

(5e) No station shall retransmit programs or signals below 420 MHz emanating from any type of radio station other than an amateur station....

#### 97.119 Station identification:

(a) Each amateur station, except a space station or telecommand station, must transmit its assigned call sign on its transmitting channel at the end of each communication, and at least every 10 minutes during a communication below 420 MHz, otherwise every 60 minutes on the hour during continuous transmission.....

#### Justification:

This amateur radio rule change request fully protects the integrity of the spectrum, provide new opportunities for non-commercial, community oriented radio one way amateur radio transmissions with additional diversity in radio voices and program services with an emphasis on providing emergency public information above 420 MHz . This solution would not require any new frequency allocations or frequency re-allocations and it would not require any new FCC regulatory burdens..

This amateur radio rule change request would authorize amateur radio stations, if they so choose, to make non-commercial one way transmissions to the community, using existing UHF amateur frequency allocations, above 420 MHz.

1. The amateur radio frequency frequencies above 420 MHz are seriously underutilized, on balance, in 99.9% of the United States. This fact can be confirmed by any of your FCC monitoring staff.
2. Amateur radio stations are licensed to an individual and licenses cannot be sold or transferred.
3. Amateur radio stations are non-commercial
4. Amateur radio licensees are individually tested under FCC jurisdiction.
5. Amateur radio licensees tend to be self-policing.
6. Amateur radio licensees live in their local community.
7. Amateur radio stations already voluntarily frequency coordinate using commonly accepted band plans. Because of this, frequency interference problems tend to be minimal.

8. Amateur radio licensees already have a diversity of radio voices.
9. Amateur radio signals above 420 MHz tend to be low power and local in nature.
10. Amateur radio antennas above 420 MHz tend to be very small in size.
11. Amateur radio antenna towers less than 70 feet high are generally permitted in any community. A signal from the typical amateur radio tower should cover most small communities.
12. All that would be needed to receive an amateur radio transmission above 420 MHz is an inexpensive scanner radio. These radios already are widely owned and can be purchased in any Radio Shack type store.

To make this proposal work the FCC would only do three things:

1. Allow amateur radio FCC call sign ID's on the hour rather than every ten minutes.
2. Allow amateur radio one way transmissions to include community news, views and analog music content in the current amateur radio allocations above 420 MHz.
3. Allow one way transmission frequency coordination with generally accepted volunteer state amateur radio frequency coordinators.

Who would oppose this solution:

This solution will likely see opposition by the American Radio Relay League. The ARRL may claim that amateur UHF bands are too congested. This is not true. The ARRL may claim that amateur radio is for public service. This is true and this is exactly the reason for this solution. The ARRL may claim that amateur radio is to train morse code operators. This is no longer true. Not even the U.S. Coast Guard uses morse code for emergency communication. The ARRL may claim that amateur radio is a hobby. This is true and all the better to not be held accountable to multi-state large corporate commercial interests.

What does this writer know about low power FM radio, amateur radio or radio in general?

I have held an amateur radio license for 40 years. My call sign is W0KIE. I was a U.S. Navy Communications Technician – Radio Branch with emphasis on morse code reception. I served at the Naval Communications Station on Guam Island and was trained at Skaggs Island, California.

I am past president of the Oral Roberts University amateur radio club and past president of the Tulsa Repeater Organization.

I am owner of the W0KIE Satellite Radio Network that airs programming on C band satellite, GE-1, transponder 12, 5.7 narrow band audio. The network programs can additionally be heard on the Internet using realaudio at <http://www.w0kie.com>. Network programming is aimed at the back yard dish owner and amateur radio operator. I am also an enrolled Creek Nation citizen.

In closing, my solution is fully and completely in the public interest and necessity.

Submitted by:

A handwritten signature in black ink, appearing to read "Mike Reynolds". The signature is fluid and cursive, with the first name "Mike" and last name "Reynolds" clearly distinguishable.

Michael R. Reynolds, MBA, CPA  
3826 S 92 East Pl.  
Tulsa, OK 74145  
February 24, 1999